

David Plotsky,  
 State Bar No. 251174  
 Plotsky and Dougherty, PC  
 122 Girard, S.E.  
 Albuquerque, New Mexico, 87106  
 505-268-0095 (fax) 505-266-9585  
[plotskylaw@gmail.com](mailto:plotskylaw@gmail.com)  
 Attorney for Defendant, Yvonne Lattimore

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

**SAN JOSE DIVISION**

|                                 |   |                                |
|---------------------------------|---|--------------------------------|
| <b>UNITED STATES OF AMERICA</b> | ) | <b>NO. CR 19-00046 BLF</b>     |
|                                 | ) |                                |
| <b>Plaintiff,</b>               | ) |                                |
|                                 | ) |                                |
| <b>vs.</b>                      | ) |                                |
|                                 | ) |                                |
| <b>YVONNE LATTIMORE</b>         | ) |                                |
|                                 | ) |                                |
| <b>Defendant.</b>               | ) | <b>DECLARATION OF DAVID L.</b> |
|                                 | ) | <b>PLOTSKY IN SUPPORT OF</b>   |
|                                 | ) | <b>EX PARTE MOTION FOR</b>     |
|                                 | ) | <b>RELEASE OF FILES</b>        |
|                                 | ) |                                |
|                                 | ) |                                |

I, David L. Plotsky, declare:

1. I am a duly licensed attorney admitted to practice in the Courts of the State of California.
2. I have been appointed by this Court to represent the Defendant, Yvonne Lattimore.
3. In order to competently represent the Defendant, I believe I need, and therefore I am requesting herein that the Court order the Federal Public Defender's office to release to me its' complete file, including, but not limited to, all investigative work and

1 all documents obtained, whether through discovery, investigation, or from the client, as  
2 well as all electronic data, including the Case Map 13 case file, regarding my client,  
3 Yvonne Lattimore.

4 4. I understand that while the Federal Public Defender's Office of the  
5 Northern District of California has provided its' file to the Defendants' previous counsel,  
6 Bruce Funk, Esq., I have been advised certain documents were inadvertently not provided  
7 to Mr. Funk; and therefore, as a matter of thoroughness and to ensure I have everything  
8 pertaining to this matter from the Public Defenders' Office, I am making this request.

9 I declare as an officer of this Court, the events set forth herein are true and correct  
10 to the best of my knowledge.

11 Dated: July 21, 2021

12  
13 Respectfully Submitted,  
14

15 /s/ David L. Plotsky

16 David L. Plotsky

17 [plotskylaw@gmail.com](mailto:plotskylaw@gmail.com)

18 PLOTSKY & DOUGHERTY, P.C

19 122 Girard Blvd. SE

20 Albuquerque, NM 87106

21 (505) 268-0095 – Telephone

22 (505) 266-9585 - Fax

23 *Counsel for Defendant*  
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